## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

M.D., by her next friend, SARAH R.

STUKENBERG, et al.,

Plaintiffs,

vs.

Civil Action No. 2:11-CV-00084

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, et al.,

Defendants.

## DEFENDANT JAIME MASTERS'S EXHIBIT LIST FOR MAY 5, 2021, COMPLIANCE HEARING

Defendant Jamie Masters, in her official capacity as Commissioner of the Department of Family and Protective Services of the State of Texas ("Defendant") intends to offer the following exhibits at the compliance hearing scheduled for May 5, 2021. Defendant Masters may offer additional exhibits if needed to show compliance with the Remedial Orders in this cause.

Exhibit A - Declaration of Erica Bañuelos (May 2021), Remedial Order 2		
Cite	Document title	Exhibit #
EBRO2 (May 2021) paragraph #5	Email from Deneen Dryden, "Daily CVS Caseload Tracker Report	Ex. A-01
EBRO2 (May 2021) paragraph #8.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads Dec 2020 – 2-1-21 101040	Ex. A-02
EBRO2 (May 2021) paragraph #8.2	RO1.1. CPD and graduated CL for 2INgage Dec – 2-1-21	Ex. A-03
EBRO2 (May 2021) paragraph #8.3	RO1.1 CPD and graduated CL for OCOK Dec – 2-1-21	Ex. A-04
EBRO2 (May 2021) paragraph #11.1	Eaton Email to Monitors dated March 4, 2021	Ex. A-05

		_	
EBRO2 (May 2021) paragraph #11.2	RO1.1. CPD and graduated CL for 2INgage June-Jan 21 (reformat)- 3-1-21	Ex. A-06	
EBRO2 (May 2021) paragraph #11.3	RO1.1 CPD and graduated CL for OCOK thru Jan 21 (reformat)- 3-1-21	Ex. A-07	
EBRO2 (May 2021) paragraph #12	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads Jan 2020 – 3-1-21 101340	Ex. A-08	
EBRO2 (May 2021) paragraph #14.1	Bugg Email to Monitors	Ex. A-09	
EBRO2 (May 2021) paragraph #14.2	"Daily Child Counts"	Ex. A-10	
EBRO2 (May 2021) paragraph #15	Caseload Tracker Message	Ex. A-11	
EBRO2 (May 2021) paragraph #16	Caseload Tracker Regional Plan Template	Ex. A-12	
EBRO2 (May 2021) paragraph #18	FINAL - OCOK Graduate caseload request to SSCCs - Revised 3-23-2021	Ex. A-13	
EBRO2 (May 2021) paragraph #19.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads Feb 2021 – 4-1-21 101645	Ex. A-14	
EBRO2 (May 2021) paragraph #19.2	RO1.1. CPD and graduated CL for 2INgage Feb – 4-1-21	Ex. A-15	
EBRO2 (May 2021) paragraph #19.3	RO1.1 CPD and graduated CL for OCOK Feb – 4-1-21	Ex. A-16	
Exhibit B - Declaration of E	Exhibit B - Declaration of Erica Bañuelos (Jan 2021) - Remedial Order 2		
EBRO2 (Jan 2021) paragraph #28	CPS Generally Applicable Internal Caseload Standards	Ex. B-01	
EBRO2 (Jan 2021) paragraph #34.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads July 2020 – 915-20 99520	Ex. B-02	
EBRO2 (Jan 2021) paragraph #34.2	RO1.1, CPD and graduated CL for 2INgage July – 9-15-20	Ex. B-03	
EBRO2 (Jan 2021) paragraph #34.3	RO1.1 CPD and graduated CL for OCOK July – 9-15-20	Ex. B-04	

EBRO2 (Jan 2021) paragraph #35.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads Aug 2020 – 9-30-20 99630	Ex. B-05
EBRO2 (Jan 2021) paragraph #35.2	RO1.1. CPD and graduated CL for 2INgage Aug - 9-30-20	Ex. B-06
EBRO2 (Jan 2021) paragraph #35.3	RO1.1 CPD and graduated CL for OCOK Aug – 9-30-20	Ex. B-07
EBRO2 (Jan 2021) paragraph #38.1	RO2.4 and RO1.1. DFPS CVS Grad CL and CPD grads Sept 2020 – 11-2-20 99963	Ex. B-08
EBRO2 (Jan 2021) paragraph #38.2	RO1.1 CPD and graduated CL for 2INgage Sept – 11-2-20	Ex. B-09
EBRO2 (Jan 2021) paragraph #38.3	RO1.1 CPD and graduated CL for OCOK Sept – 11-2-20	Ex. B-10
EBRO2 (Jan 2021) paragraph #41.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads Oct 2020 – 11-30-20 100484	Ex. B-11
EBRO2 (Jan 2021) paragraph #41.2	RO1.1. CPD and graduated CL for 2INgage Oct – 11-30-20	Ex. B-12
EBRO2 (Jan 2021) paragraph #41.3	RO1.1 CPD and graduated CL for OCOK Oct – 11-30-20	Ex. B-13
EBRO2 (Jan 2021) paragraph #43.1	RO2.4 and RO1.1 DFPS CVS Grad CL and CPD grads May- Nov 2020 – 1-4-21 101199	Ex. B-14
EBRO2 (Jan 2021) paragraph #43.2	RO1.1, CPD and graduated CL for 2INgage Nov – 1-4-21	Ex. B-15
EBRO2 (Jan 2021) paragraph #43.3	RO1.1 CPD and graduated CL for OCOK Nov 20 -1-4-21	Ex. B-16
EBRO2 (Jan 2021) paragraph #45.1	Daily Caseload Tracker Screenshot	Ex. B-17
EBRO2 (Jan 2021) paragraph #45.2	Caseload Tracker Message	Ex. B-18
EBRO2 (Jan 2021) paragraph #47	Exhibit A 3b Statement of Work 5.0_Final Draft	Ex. B-19

Exhibit C - Declaration of Stephen Black (May 2021) - Remedial Order 3		
SBRO3 (May2021) – paragraph #10.1	March 11, 2021 Email from Zarate to DFPS SWI, PN Dropdown Changes Coming 3/25	Ex. C-01
SBRO3 (May2021) – paragraph #10.2	Maintenance Completed: IMPACT 2.0, IMPACT Legacy, SWI Maintenance for Thursday 4/8/2021 9:00 p.m. – 11:00 p.m. has completed	Ex. C-02
SBRO3 (May2021) – paragraph #12	DFPS Data Book located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp">http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp</a>	Ex. C-03
SBRO3 (May2021) – paragraph #13	DFPS Data Book located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp">http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp</a>	Ex. C-04
SBRO3 (May2021) – paragraph #16	Statewide Intake: Phone Calls by Queue located at http://www.dfps.state.tx.us/About_DFPS/Dat a_Book/Statewide_Intake/Phone_Calls.asp	Ex. C-05
Exhibit D - Declaration of S	tephen Black (Jan 2021) - Remedial Order 3	
SBRO3 (Jan 2021) – paragraph #9	Statewide Intake Policy and Procedures Section 1510 located at http://www.dfps.state.tx.us/handbooks/SWI_P rocedures/Files/SWP_pg_1000.asp#SWP_151 0	Ex. D-01
SBRO3 (Jan 2021) – paragraph #10.1	Statewide Intake Policy and Procedures Section 2251 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> rocedures/Files/SWP_pg_2000.asp#SWP_225 1	Ex. D-02
SBRO3 (Jan 2021) – paragraph #10.2	Statewide Intake Policy and Procedures Section 2252 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_225">rocedures/Files/SWP_pg_2000.asp#SWP_225</a> <a href="mailto:2000.asp#SWP_225">2</a>	Ex. D-03

_		
SBRO3 (Jan 2021) – paragraph #10.3	Statewide Intake Policy and Procedures Section 2311 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_231">rocedures/Files/SWP_pg_2000.asp#SWP_231</a> <a href="mailto:1">1</a> <a href="mailto:1">1</a>	Ex. D-04
SBRO3 (Jan 2021) – paragraph #12.1	Statewide Intake Policy and Procedures Section 1510 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_1000.asp#SWP_151">rocedures/Files/SWP_pg_1000.asp#SWP_151</a> <a href="mailto:0">0</a>	Ex. D-05
SBRO3 (Jan 2021) – paragraph #12.2	Statewide Intake Policy and Procedures Section 2810 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_281">rocedures/Files/SWP_pg_2000.asp#SWP_281</a> <a href="mailto:up&gt;0">0</a>	Ex. D-06
SBRO3 (Jan 2021) – paragraph #13.1	Statewide Intake Policy and Procedures Section 2420 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_242">rocedures/Files/SWP_pg_2000.asp#SWP_242</a> <a handbooks="" href="mailto:000000000000000000000000000000000000&lt;/td&gt;&lt;td&gt;Ex. D-07&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;SBRO3 (Jan 2021) –&lt;br&gt;paragraph #13.2&lt;/td&gt;&lt;td&gt;Statewide Intake Policy and Procedures Section 2560 at &lt;a href=" http:="" swi_p"="" www.dfps.state.tx.us="">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_256">rocedures/Files/SWP_pg_2000.asp#SWP_256</a> <a href="mailto:0">0</a>	Ex. D-08
SBRO3 (Jan 2021) – paragraph #14	Statewide Intake Policy and Procedures Section 5230 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_5000.asp#SWP_523">rocedures/Files/SWP_pg_5000.asp#SWP_523</a> <a handbooks="" href="mailto:000000000000000000000000000000000000&lt;/td&gt;&lt;td&gt;Ex. D-09&lt;/td&gt;&lt;/tr&gt;&lt;tr&gt;&lt;td&gt;SBRO3 (Jan 2021) –&lt;br&gt;paragraph #15.1&lt;/td&gt;&lt;td&gt;Statewide Intake Policy and Procedures Section 2681 located at &lt;a href=" http:="" swi_p"="" www.dfps.state.tx.us="">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_268">rocedures/Files/SWP_pg_2000.asp#SWP_268</a>	

SBRO3 (Jan 2021) – paragraph #15.2	Statewide Intake Policy and Procedures Section 2684 located at <a href="http://www.dfps.state.tx.us/handbooks/SWI_P">http://www.dfps.state.tx.us/handbooks/SWI_P</a> <a href="mailto:rocedures/Files/SWP_pg_2000.asp#SWP_268">rocedures/Files/SWP_pg_2000.asp#SWP_268</a> <a href="mailto:delta-files/SWP_pg_2000.asp#SWP_268">delta-files/SWP_pg_2000.asp#SWP_268</a> <a href="mailto:delta-files/SWP_pg_2000.asp#SWP_268">delta-files/SWP_pg_2000.asp#SWP_268</a> <a href="mailto:delta-files/SWP_pg_2000.asp#SWP_268">http://www.dfps.state.tx.us/handbooks/SWI_P</a>	Ex. D-11
SBRO3 (Jan 2021) – paragraph #17	DFPS Data Book located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp">http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp</a>	Ex. D-12
SBRO3 (Jan 2021) – paragraph #18	DFPS Data Book located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp">http://www.dfps.state.tx.us/About_DFPS/Data_Book/Statewide_Intake/Contacts.asp</a>	Ex. D-13
SBRO3 (Jan 2021) – paragraph #25	Statewide Intake: Phone Calls by Queue located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_a_Book/Statewide_Intake/Phone_Calls.asp">http://www.dfps.state.tx.us/About_DFPS/Data_a_Book/Statewide_Intake/Phone_Calls.asp</a>	Ex. D-14
SBRO3 (Jan 2021) – paragraph #28	Statewide Intake: Phone Calls by Queue located at <a href="http://www.dfps.state.tx.us/About_DFPS/Data_a_Book/Statewide_Intake/Phone_Calls.asp">http://www.dfps.state.tx.us/About_DFPS/Data_a_Book/Statewide_Intake/Phone_Calls.asp</a>	Ex. D-15
SBRO3 (Jan 2021) – paragraph #34.1	October 2019 Email to Monitors	Ex. D-16
SBRO3 (Jan 2021) – paragraph #34.2	September 2019 DFPS SWI Monthly Dashboard	Ex. D-17
SBRO3 (Jan 2021) – paragraph #34.3	Getting to Know Statewide Intake	Ex. D-18
SBRO3 (Jan 2021) – paragraph #35.1	APS In Home Intake Guidelines	Ex. D-19
SBRO3 (Jan 2021) – paragraph #35.2	APS Provider Investigations- Facility Intake Guidelines	Ex. D-20
SBRO3 (Jan 2021) – paragraph #35.3	APS Provider Investigations- Provider Intake Guidelines	Ex. D-21
SBRO3 (Jan 2021) – paragraph #35.4	CPS Intake Guidelines	Ex. D-22
SBRO3 (Jan 2021) – paragraph #35.5	DCL Intake Guidelines	Ex. D-23

SBRO3 (Jan 2021) – paragraph #35.6	I&R and CRSR Types and Requirements	Ex. D-24
SBRO3 (Jan 2021) – paragraph #35.7	RCCL Intake Guidelines	Ex. D-25
SBRO3 (Jan 2021) – paragraph #36	November 2019 Email to Monitors	Ex. D-26
SBRO3 (Jan 2021) – paragraph #37	Forty-three .wav audio recording files – Statement Document	Ex. D-27
SBRO3 (Jan 2021) – paragraph #38.1	December 2019 Email to Monitors	Ex. D-28
SBRO3 (Jan 2021) – paragraph #38.2	Verint User Guide	Ex. D-29
SBRO3 (Jan 2021) – paragraph #40	February 2020 Email to Monitors	Ex. D-30
SBRO3 (Jan 2021) – paragraph #41.1	February 26, 2020 Email to Monitors re Daily SWI Call Reports	Ex. D-31
SBRO3 (Jan 2021) – paragraph #41.2	January 2021 Email to Monitors re Statewide Intake Daily Call Report	Ex. D-32
SBRO3 (Jan 2021) – paragraph #42	March 2020 Email to Monitors re Daily SWI Call Report Cadence	Ex. D-33
SBRO3 (Jan 2021) – paragraph #43	March 2020 Email to Monitors re Screening Review Question,	Ex. D-34
SBRO3 (Jan 2021) – paragraph #44	RCCI Intake Guidelines	Ex. D-35
SBRO3 (Jan 2021) – paragraph #45.1	March 2020 Email to Monitors	Ex. D-36
SBRO3 (Jan 2021) – paragraph #45.2	SWI Abuse Hotline Call Flow and DFPS Response to March 2020 Monitor Information Request	Ex. D-37
SBRO3 (Jan 2021) – paragraph #46.1	October 2020 Email to Monitors	Ex. D-38

SBRO3 (Jan 2021) – paragraph #46.2	SWI CCI Screener Training Design Document and Statewide Intake Organizational Chart	Ex. D-39
Exhibit E - Declaration of J	ustin Lewis (May 2021) - Remedial Orders 3, 5	5, 7, 10, and B5
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #17	#13 Domestic Minor Sex Trafficking	Ex. E-01
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #18.1	January 25, 2021 Email from DFPS CCL Investigations, Awake Night Supervision	Ex. E-02
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #18.2	FC32_Notifications regarding 24-Hour Awake Night Supervision Compliance	Ex. E-03
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #19.1	January 2021 Blueprints for Quality Investigations	Ex. E-04
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #19.2	Child Care Investigations Handbook 6524, located at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6524">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6524</a>	Ex. E-05
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #20	CCI Job Aid Conducting Person Merges in IMPACT 2.0	Ex. E-06
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #21	02.01.21 Investigation Supervisor Reading Guide	Ex. E-07
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #22	Child Care Investigations Handbook 6611.4  Time Frame for Supervisor to Approve or Reject an Extension Report, located at http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6600.asp#LPPH_6611_4	Ex. E-08
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #23	February 2021 Blueprints for Quality Investigations	Ex. E-09
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #24.1	February 17, 2021 Email from Cox to RCCI Staff, Survey for Weather System Face to Face Tracking	Ex. E-10
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #24.2	Survey screenshots, CCI Investigations with Virtual or LE Contacts during 2021 Winter Storm	Ex. E-11

JLR03, 5, 7, 10, B5 (May 2021) – paragraph #25	02.26.21 Field Communication #33 Notifying a Child's Caseworker in Emergency Situations	Ex. E-12
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #26.1	Power Point Danger Indicators, Job Aid on Safety Plans and Danger Indicators,	Ex. E-13
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #26.2	List of Danger Indicators	Ex. E-14
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #27	Child Care Investigations Handbook 6626.1,  Documenting Child Sexual Aggression  Determinations for a Child in DFPS  Conservatorship at DONE  http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6600.asp#LPPH_6626_1	Ex. E-15
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #28	March 2021 Blueprints – Final	Ex. E-16
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #29.1	CCI Pre BSD IT Training V2 Instructor Guide	Ex. E-17
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #29.2	CCI Pre BSD IT Training V2 Participant Guide	Ex. E-18
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #30	April 22, 2021 Email from DFPS CCL Investigations to DFPS CCL Investigations Division Staff	Ex. E-19
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #31.1	March 9, 2021, Email from Cox, Email 6362 Investigation Assignment Conference	Ex. E-20
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #31.2	R 05 Staffing and Extension Compliance February	Ex. E-21
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #32	Criteria for Identifying a Person Charge as an Alleged Perpetrator	Ex. E-22
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #33	2021 February Rejections	Ex. E-23

JLR03, 5, 7, 10, B5 (May 2021) – paragraph #35	I Take It Back	Ex. E-24
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.1	Child Care Investigations Handbook 6212, Intake Reports Not Requiring Screening at http://www.dfps.state.tx.us/handbooks/CCI/Fi	Ex. E-25
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.2	Child Care Licensing Handbook at 6634, <i>Notification to Child Care Licensing</i> at http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6634]	Ex. E-26
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.3	Child Care Investigations Handbook 6362, <i>Investigation Assignment Conference</i> at http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6362	Ex. E-27
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.4	Child Care Investigations Handbook 6142.12, Notifying the Contract Manager of Investigation Findings, located at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6142_1_2">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6142_1_2</a>	Ex. E-28
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.5	Child Care Investigations Handbook at 6634, <i>Notification to Child Care Licensing</i> , located at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6634">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6634</a>	Ex. E-29
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #36.6	Child Care Investigations Handbook 6631.1, <i>Documenting the Notification to the Residential Care Operation</i> , located at http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6631_1	Ex. E-30
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #37	April DFPS HR Matters Bulletin	Ex. E-31
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #38	Field Communication #36 Fatality and Near Fatality Investigations	Ex. E-32
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #39	Multiple Referral, Fatal and Near Fatal Investigation Reviews	Ex. E-33

CCRO3,5,7,10,B5 (Jan 2021) paragraph #14.2	Email dated October 14, 2020, from Carmical to Monitors ( <i>October Blueprints training</i> )	Ex. F-003
CCRO3,5,7,10,B5 (Jan 2021) paragraph #14.1	Email dated September 7, 2020, from Carmical to Monitors ( <i>RE: RCCI updates</i> )	Ex. F-002
CCRO3,5,7,10,B5 (Jan 2021) paragraph #13	Child Care Investigations Handbook Revision, August 10, 2020, located at: <a href="https://www.dfps.state.tx.us/handbooks/CCI/Revision/LPPH_revisions_after_5-07/2020-08-10_CPI_memo.asp">https://www.dfps.state.tx.us/handbooks/CCI/Revision/LPPH_revisions_after_5-07/2020-08-10_CPI_memo.asp</a>	Ex. F-001
Exhibit F - Declaration of Ju	stin Lewis (Jan 2021) - Remedial Orders 3, 5,	7, 10, and B5
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #48	Statewide Intake Policy & Procedures 3101, 3101 CVS Caseworker Notification, located at http://www.dfps.state.tx.us/handbooks/SWI_P rocedures/Files/SWP_pg_3000.asp#SWP_310 1	Ex. E-38
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #45.4	Child Care Investigations Handbook 6631.1, <i>Documenting the Notification to the Residential Care Operation</i> , located at http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6631_1	Ex. E-37
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #45.3	Child Care Investigations Handbook at 6634, <i>Notification to Child Care Licensing</i> , located at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6634">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6634</a>	Ex. E-36
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #45.2	Child Care Investigations Handbook 6142.12, <i>Notifying the Contract Manager of Investigation Findings</i> , located at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6142_12">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6142_12</a>	Ex. E-35
JLR03, 5, 7, 10, B5 (May 2021) – paragraph #45.1	Child Care Investigations Handbook 6212, <i>Intake Reports Not Requiring Screening</i> at <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6212">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6212</a>	Ex. E-34

CCRO3,5,7,10,B5 (Jan 2021) paragraph #14.3	Email dated December 1, 2020, from Bugg to Monitors ( <i>Policy Updates and Communications</i> )	Ex. F-004
CCRO3,5,7,10,B5 (Jan 2021) paragraph #14.4	Email dated December 18, 2020, from Bugg to Monitors (Contract update, Blueprint, and SSCC Meetings)	Ex. F-005
CCRO3,5,7,10,B5 (Jan 2021) paragraph #15	Neglectful Supervision Training Powerpoint	Ex. F-006
CCRO3,5,7,10,B5 (Jan 2021) paragraph #17	CCI Quality Monitoring Business Process	Ex. F-007
CCRO3,5,7,10,B5 (Jan 2021) paragraph #24.1	Policy Section 6222 Assessing an Intake Report for Priority	Ex. F-008
CCRO3,5,7,10,B5 (Jan 2021) paragraph #24.2	August 2020 - Policy Section 6222	Ex. F-009
CCRO3,5,7,10,B5 (Jan 2021) paragraph #25.1	August 2020 - 6361.1 Time Frame for Initiating a Priority 1 (P1) Investigation	Ex. F-010
CCRO3,5,7,10,B5 (Jan 2021) paragraph #25.2	August 2020 - 6361.2 Time Frame for Initiating a Priority 2 (P2) Investigation	Ex. F-011
CCRO3,5,7,10,B5 (Jan 2021) paragraph #25.3	August 2020 - 6241.2 Downgrading and Abuse, Neglect, or Exploitations Intake Report to a Priority None (PN) Intake Report	Ex. F-012
CCRO3,5,7,10,B5 (Jan 2021) paragraph #26.1	Child Care Investigations Handbook Section 6623 located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6623">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6623</a>	Ex. F-013
CCRO3,5,7,10,B5 (Jan 2021) paragraph #26.2	Child Care Investigations Handbook Section 6570, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6570">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6570</a>	Ex. F-014
CCRO3,5,7,10,B5 (Jan 2021) paragraph #33	August 2020 - 6241.2 Downgrading and Abuse, Neglect, or Exploitations Intake Report to a Priority None (PN) Intake Report	Ex. F-015
CCRO3,5,7,10,B5 (Jan 2021) paragraph #36	Child Care Investigations Handbook Section 6631, located at:	Ex. F-016

	letter//www. Afec state to well-on the also/CCI/E:	T
	http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6600.asp#LPPH_6631	
CCRO3,5,7,10,B5 (Jan 2021) paragraph #38	Field Communication #027	Ex. F-017
CCRO3,5,7,10,B5 (Jan 2021) paragraph #39	CCI Handbook Section 6211.1, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6211_1	Ex. F-018
CCRO3,5,7,10,B5 (Jan 2021) paragraph #40	Field Communication #027	Ex. F-019
CCRO3,5,7,10,B5 (Jan 2021) paragraph #42.1	Email dated October 14, 2020, from Carmical to Monitors ( <i>October Blueprints training</i> ) and	Ex. F-020
CCRO3,5,7,10,B5 (Jan 2021) paragraph #42.2	Blueprints for Quality Investigations Memo- Oct 2020	Ex. F-021
CCRO3,5,7,10,B5 (Jan 2021) paragraph #42.3	Child Care Investigations Handbook Section 6362, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6362	Ex. F-022
CCRO3,5,7,10,B5 (Jan 2021) paragraph #42.4	Child Care Investigations Handbook Section 6362.1, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6362_1">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6362_1</a>	Ex. F-023
CCRO3,5,7,10,B5 (Jan 2021) paragraph #42.5	Child Care Investigations Handbook Section 6627, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6627">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6627</a>	Ex. F-024
CCRO3,5,7,10,B5 (Jan 2021) paragraph #43.1	Email dated October 14, 2020, from Carmical to Monitors ( <i>October Blueprints training</i> )	Ex. F-025
CCRO3,5,7,10,B5 (Jan 2021) paragraph #43.2	Blueprints for Quality Investigations Memo - Oct 2020	Ex. F-026
CCRO3,5,7,10,B5 (Jan 2021) paragraph #45.1	Child Care Investigations Handbook Section 7712.1, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_7600.asp#LPPH_7712_1	Ex. F-027
CCRO3,5,7,10,B5 (Jan 2021) paragraph #45.2	Child Care Investigations Handbook Section 7717.3, located at:	Ex. F-028

	T	T
	http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_7600.asp#LPPH_7717_3	
CCRO3,5,7,10,B5 (Jan 2021) paragraph #45.3	Child Care Licensing Policy and Procedures Handbook Sections 7716.1 and 7718, located at: https://hhs.texas.gov/book/export/html/17458 1	Ex. F-029
CCRO3,5,7,10,B5 (Jan 2021) paragraph #47.1	Field Communication #028	Ex. F-030
CCRO3,5,7,10,B5 (Jan 2021) paragraph #47.2	Field Communication #029	Ex. F-031
CCRO3,5,7,10,B5 (Jan 2021) paragraph #47.3	Child Care Investigations Handbook 6211, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6211">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6211</a>	Ex. F-032
CCRO3,5,7,10,B5 (Jan 2021) paragraph #47.4	Child Care Investigations Handbook 6211.1, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6211_1	Ex. F-033
CCRO3,5,7,10,B5 (Jan 2021) paragraph #47.5	Child Care Investigations Handbook 6241.2, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6241	Ex. F-034
CCRO3,5,7,10,B5 (Jan 2021) paragraph #51.1	Email dated December 1, 2020, from Bugg to Monitors ( <i>Policy Updates and Communications</i> )	Ex. F-035
CCRO3,5,7,10,B5 (Jan 2021) paragraph #51.2	November 2020 – Blueprints For Quality Investigations Memo	Ex. F-036
CCRO3,5,7,10,B5 (Jan 2021) paragraph #54	(November 2020 - 6143 CPI Special Investigators)	Ex. F-037
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.1	Child Care Investigations Handbook Section 6140, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6140">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6140</a>	Ex. F-038
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.2	Child Care Investigations Handbook Section 6141, located at:	Ex. F-039

	<u></u>	T
	http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6141	
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.3	Child Care Investigations Handbook Section 6142, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6142	Ex. F-040
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.4	Child Care Investigations Handbook Section 6144, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6144">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6000.asp#LPPH_6144</a>	Ex. F-041
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.5	Child Care Investigations Handbook Section 6262, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6262	Ex. F-042
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.6	(November 2020- Section 6413 Documenting the Initiation and Face to Face)	Ex. F-043
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.7	Child Care Investigations Handbook Section 6627, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6600.asp#LPPH_6627	Ex. F-044
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.8	(September 2020 - 6413.2 Documenting Time Frame-Required Contacts in IMPACT (Numbered as Policy 6412.2 as of Jan 2021)	Ex. F-045
CCRO3,5,7,10,B5 (Jan 2021) paragraph #59.9	Child Care Investigations Handbook Section 6362, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6362	Ex. F-046
CCRO3,5,7,10,B5 (Jan 2021) paragraph #60	ARIF and SOAH Tracking Tool	Ex. F-047
CCRO3,5,7,10,B5 (Jan 2021) paragraph #65	CaseTrack Training Materials	Ex. F-048
CCRO3,5,7,10,B5 (Jan 2021) paragraph #67.1	Email dated December 18, 2020, from Bugg to Monitors (Contract update, Blueprint, and SSCC Meetings)	Ex. F-049
CCRO3,5,7,10,B5 (Jan 2021) paragraph #67.2	December 2020 – Blueprints For Quality Investigations Memo	Ex. F-050

CCRO3,5,7,10,B5 (Jan 2021) paragraph #68	Letter Template to Request Records from Law Enforcement Email Attachment	Ex. F-051
CCRO3,5,7,10,B5 (Jan 2021) paragraph #69.1	Field Communication #30, Conducting Searches in CLASS and accompanying Job Aid	Ex. F-052
CCRO3,5,7,10,B5 (Jan 2021) paragraph #69.2	December 2020 Email from Bugg to Monitors	Ex. F-053
CCRO3,5,7,10,B5 (Jan 2021) Paragraph #069.3	DFPS Child Care Investigations Division Field Communication	Ex. F-054
CCRO3,5,7,10,B5 (Jan 2021) paragraph #70.1	Field Communication #31, Clarification on Safety Plans	Ex. F-055
CCRO3,5,7,10,B5 (Jan 2021) paragraph #70.2	December 2020 Email from Bugg to Monitors	Ex. F-056
CCRO3,5,7,10,B5 (Jan 2021) paragraph #71	Child Care Investigations Handbook Section 6362, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6362	Ex. F-057
CCRO3,5,7,10,B5 (Jan 2021) paragraph #72.1	Child Care Investigations Handbook Section 6145, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp#LPPH_6145	Ex. F-058
CCRO3,5,7,10,B5 (Jan 2021) paragraph #72.2	Child Care Investigations Handbook Section 6412, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp	Ex. F-059
CCRO3,5,7,10,B5 (Jan 2021) paragraph #72.3	Child Care Investigations Handbook Section 6524, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6524	Ex. F-060
CCRO3,5,7,10,B5 (Jan 2021) paragraph #76	Initiation and Face-to-Face Contact – History of Policy Changes	Ex. F-061
CCRO3,5,7,10,B5 (Jan 2021) paragraph #78	November 2020- 6411 What Constitutes an Initiation	Ex. F-062
CCRO3,5,7,10,B5 (Jan 2021) paragraph #83	Email dated September 7, 2020, from Carmical to Monitors ( <i>RE: RCCI updates</i> )	Ex. F-063

CCRO3,5,7,10,B5 (Jan 2021) paragraph #84	Field Communication #026 Publication of changes to Initiation, Face-to-Face with Alleged Victims, and RC Provider Notification	Ex. F-064
CCRO3,5,7,10,B5 (Jan 2021) paragraph #85	Initiation and Face-to-Face Contact – History of Policy Changes	Ex. F-065
CCRO3,5,7,10,B5 (Jan 2021) paragraph #87	Email dated November 25, 2020, from DFPS CCL Investigations to RCCI ( <i>Policy Changes Effective December 1, 2020 Effective December 1, 2020</i>	Ex. F-066
CCRO3,5,7,10,B5 (Jan 2021) paragraph #88	(November 2020 - 6411 Defining What Constitutes an Initiation)	Ex. F-067
CCRO3,5,7,10,B5 (Jan 2021) paragraph #91.1	(November 2020 - 6412 Time Frames for Face)	Ex. F-068
CCRO3,5,7,10,B5 (Jan 2021) paragraph #91.2	Email dated December 1, 2020, from Bugg to Monitors ( <i>Policy Updates and Communications</i> )	Ex. F-069
CCRO3,5,7,10,B5 (Jan 2021) paragraph #93	Child Care Investigations Handbook Section 6412.2, located at: http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6412_2	Ex. F-070
CCRO3,5,7,10,B5 (Jan 2021) paragraph #94	(Initiation and Face-to-Face Contact – History of Policy Changes)	Ex. F-071
CCRO3,5,7,10,B5 (Jan 2021) paragraph #109	CCI Field Communication #26, dated September 3, 2020	Ex. F-072
CCRO3,5,7,10,B5 (Jan 2021) paragraph #112	Email dated July 23, 2020, from CCL Investigations to CCI Staff, Required Documentation Procedures for Automation in IMPACT 2.0	Ex. F-073
CCRO3,5,7,10,B5 (Jan 2021) paragraph #115	(Initiation and FTF - History of Policy Changes)	Ex. F-074
CCRO3,5,7,10,B5 (Jan 2021) paragraph #116	September Blueprints provided to the Monitors on September 7, 2020	Ex. F-075
CCRO3,5,7,10,B5 (Jan 2021) paragraph #117	(IT Automation Case Reading Checklist)	Ex. F-076

		T
CCRO3,5,7,10,B5 (Jan 2021) paragraph #120	Email dated November 25, 2020 from CCL Investigations to Staff, (Notification of Policy Changes Effective December 1, 2020)	Ex. F-077
CCRO3,5,7,10,B5 (Jan 2021) paragraph #121	Child Care Investigations Handbook Section 6362, located at: http://www.dfps.state.tx.us/handbooks/CCI/Fi les/LPPH_pg_6000.asp	Ex. F-078
CCRO3,5,7,10,B5 (Jan 2021) paragraph #124	(September 2020 - 6413.2 Documenting Time Frame-Required Contacts in IMPACT (Numbered as Policy 6412.2 as of Jan 2021)	Ex. F-079
CCRO3,5,7,10,B5 (Jan 2021) paragraph #128	Child Care Investigations Handbook Sections 6610 and 6611, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6610">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6600.asp#LPPH_6610</a>	Ex. F-080
CCRO3,5,7,10,B5 (Jan 2021) paragraph #136	Olah Email to Monitors dated January 30, 2020	Ex. F-081
CCRO3,5,7,10,B5 (Jan 2021) paragraph #139	RCCI Investigator Caseload Data Questions	Ex. F-082
CCRO3,5,7,10,B5 (Jan 2021) paragraph #152	Child Care Investigations Handbook 6524.5, located at: <a href="http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6524_5">http://www.dfps.state.tx.us/handbooks/CCI/Files/LPPH_pg_6400.asp#LPPH_6524_5</a>	Ex. F-083
CCRO3,5,7,10,B5 (Jan 2021) paragraph #154.1	CPS Policy Section 1411 located at <a href="http://www.dfps.state.tx.us/handbooks/CPS/Files/CPS_pg_1400.asp#CPS_1411">http://www.dfps.state.tx.us/handbooks/CPS/Files/CPS_pg_1400.asp#CPS_1411</a>	Ex. F-084
CCRO3,5,7,10,B5 (Jan 2021) paragraph #154.2	ACTION REQUIRED: Sub Stages Must Remain Open Until Adoption Consummation	Ex. F-085
CCRO3,5,7,10,B5 (Jan 2021) paragraph #169	RO3.1 RCI and CPI Intakes May 2020 - July- 15-20 – 98621	Ex. F-086
CCRO3,5,7,10,B5 (Jan 2021) paragraph #170	Carmical August 27, 2020 Email to Monitors re Face-to-Face Contact Data	Ex. F-087
CCRO3,5,7,10,B5 (Jan 2021) paragraph #171	August 27, 2020 Email to Monitors re Face- to-Face Contact Data	Ex. F-088
CCRO3,5,7,10,B5 (Jan 2021) paragraph #174	August 27, 2020 Email from Carmical to Monitors	Ex. F-089

CCRO3,5,7,10,B5 (Jan 2021) paragraph #175	Email Dated August 28, 2020 regarding PN assessment report, RCCI PN Assessment Report	Ex. F-090
CCRO3,5,7,10,B5 (Jan 2021) paragraph #176	RO.B1 RCI caseloads	Ex. F-091
CCRO3,5,7,10,B5 (Jan 2021) paragraph #177	October 1, 2020 Email to Monitors re QAT Analysis of PNs and INVs	Ex. F-092
CCRO3,5,7,10,B5 (Jan 2021) paragraph #178	Email dated re RCCI updates	Ex. F-093
CCRO3,5,7,10,B5 (Jan 2021) paragraph #179	RO3.1 RCI and CPI Intakes July 2020 - Sept- 15-20 – 99252	Ex. F-094
CCRO3,5,7,10,B5 (Jan 2021) paragraph #180	October 1, 2020 Email to Monitors re QAT Analysis of PNs and INVs	Ex. F-095
CCRO3,5,7,10,B5 (Jan 2021) paragraph #181.1	Copy of RO3.1 RCI and CPI Intakes Aug 2020 - Sept-30-20 – 99654	Ex. F-096
CCRO3,5,7,10,B5 (Jan 2021) paragraph #181.2	RO3.2 CPI Investigations Q4 FY20 - Sept 30- 20 – 99714	Ex. F-097
CCRO3,5,7,10,B5 (Jan 2021) paragraph #181.3	RO3.2 RCI Investigations Q4 FY 20 - Sept- 30-20- 99229-with provider dates	Ex. F-098
CCRO3,5,7,10,B5 (Jan 2021) paragraph #181.4	RO.B1 RCI caseloads as of 8-31-20 - sept-30- 20 -99638	Ex. F-099
CCRO3,5,7,10,B5 (Jan 2021) paragraph #182	October 2020 Email to Monitors re PN Changes	Ex. F-100
CCRO3,5,7,10,B5 (Jan 2021) paragraph #183	Oct 100 Email to Monitors re QAT Analysis of PNs and INVs	Ex. F-101
CCRO3,5,7,10,B5 (Jan 2021) paragraph #184	October 2020 Email to Monitors with Broadcast Communication, and October 2020 Broadcast Communication	Ex. F-102
CCRO3,5,7,10,B5 (Jan 2021) paragraph #185	October 2020 Email from Bugg to Monitors	Ex. F-103
CCRO3,5,7,10,B5 (Jan 2021) paragraph #186	October 2020 Email to Monitors re Blueprints training, October 2020 –	Ex. F-104

	Blueprints for Quality Investigations_Preponderance of Evidence	
CCRO3,5,7,10,B5 (Jan 2021) paragraph #187	October 2020 Email to Monitors	Ex. F-105
CCRO3,5,7,10,B5 (Jan 2021) paragraph #188	October 2020 Email from Bugg to Monitors re RO B5 Notifications	Ex. F-106
CCRO3,5,7,10,B5 (Jan 2021) paragraph #189	October 2020 Email to Monitors re QAT Analysis of PNs and INVs	Ex. F-107
CCRO3,5,7,10,B5 (Jan 2021) paragraph #191	November 2020 Email from AC to Monitors re OOS Placements	Ex. F-108
CCRO3,5,7,10,B5 (Jan 2021) paragraph #192	November 2020 Email from Bugg to Monitors re RCCI Policy Changes and FCs	Ex. F-109
CCRO3,5,7,10,B5 (Jan 2021) paragraph #193.1	RO3.1 RCI and CPI Intakes Sept 2020 11-2- 20	Ex. F-110
CCRO3,5,7,10,B5 (Jan 2021) paragraph #193.2	RO3.2 CPI Investigations Sept 20 11-2-20 100294	Ex. F-111
CCRO3,5,7,10,B5 (Jan 2021) paragraph #193.3	RO3.2 RCI Investigations FY 21 – Sept 20, 100165	Ex. F-112
CCRO3,5,7,10,B5 (Jan 2021) paragraph #193.4	RO.B1 RCI caseloads as of 9-31-20 – 11-2-20 -99965	Ex. F-113
CCRO3,5,7,10,B5 (Jan 2021) paragraph #194	Request for meeting question	Ex. F-114
CCRO3,5,7,10,B5 (Jan 2021) paragraph #195	Appleseed November 2020 Email to Monitors	Ex. F-115
CCRO3,5,7,10,B5 (Jan 2021) paragraph #196	Re: Data & Information Request	Ex. F-116
CCRO3,5,7,10,B5 (Jan 2021) paragraph #197.1	RO3.1 RCI and CPI Intakes Oct 2020 11-30- 20 fcl01	Ex. F-117
CCRO3,5,7,10,B5 (Jan 2021) paragraph #197.2	RO3.2 CPI Investigations Oct 20 11-30-20 100707	Ex. F-118
CCRO3,5,7,10,B5 (Jan 2021) paragraph #197.3	RO3.2 RCI Investigations Oct 20, 100489 with provider dates	Ex. F-119

		<b>.</b>
CCRO3,5,7,10,B5 (Jan 2021) paragraph #197.4	RO.B1 RCI caseloads as of 10-31-20 – 11-30- 20 -100766	Ex. F-120
CCRO3,5,7,10,B5 (Jan 2021) paragraph #198	Email from Bugg to Monitors re November 2020 Blueprints, November 2020 Blueprints for Quality Investigations, RCCI Policy Changes Effective December 1 2020	Ex. F-121
CCRO3,5,7,10,B5 (Jan 2021) paragraph #199	December 2020 Email from Bugg to Monitors re Blueprints, December 2020 – Blueprints for Quality Investigations Memo	Ex. F-122
CCRO3,5,7,10,B5 (Jan 2021) paragraph #200	December 2020 Email from Bugg to Monitors	Ex. F-123
CCRO3,5,7,10,B5 (Jan 2021) paragraph #201.1	RO3.1 RCI and CPI Intakes Nov 2020 1-4-21 fcl	Ex. F-124
CCRO3,5,7,10,B5 (Jan 2021) paragraph #201.2	RO3.2 CPI Investigations Nov 2020 1-4-21	Ex. F-125
CCRO3,5,7,10,B5 (Jan 2021) paragraph #201.3	RO3.2 RCI Investigations Nov 20	Ex. F-126
CCRO3,5,7,10,B5 (Jan 2021) paragraph #201.4	RO.B1 RCI caseloads as of 11-3—20 – 1-4-21 -100969	Ex. F-127
CCRO3,5,7,10,B5 (Jan 2021) paragraph #202	RCCI Initiation and Completion	Ex. F-128
Exhibit G - Declaration of V	Villiam Walsh (May 2021) Remedial Order 22	
WWRO22 (May 2021) – paragraph #9	Procedures in Response to Contractor Citation for Failure to Report Abuse/Neglect	Ex. G-01
WWRO22 (May 2021) – paragraph #14.1	Transmittal email for RO22 Failure to Report ANE 11.1.20 to 11.30.20, uploaded to the Monitors' SharePoint on December 31, 2020.	Ex. G-02
WWRO22 (May 2021) – paragraph #14.2	Transmittal email for RO22 Failure to Report ANE 12.1.20 to 12.31.20, uploaded to the Monitors' SharePoint on February 1, 2021.	Ex. G-03

WWRO22 (May 2021) – paragraph #14.3	Transmittal email for RO22 Failure to Report ANE 1.1.21 to 1.31.21, uploaded to the Monitors' SharePoint on March 1, 2021.	Ex. G-04
WWRO22 (May 2021) – paragraph #14.4	Transmittal email for RO22 Failure to Report ANE 2.1.21 to 2.28.21, uploaded to the Monitors' SharePoint on April 1, 2021.	Ex. G-05
Exhibit H - Declaration of W	Villiam Walsh (Dec 2020) - Remedial Order 22	2
WWRO22 (Dec 2020) – paragraph #10	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect Version 4	Ex. H-01
WWRO22 (Dec 2020) – paragraph #11	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect Draft	Ex. H-02
WWRO22 (Dec 2020) – paragraph #12.1	Corrective Action Plan and Technical Assistance Letter Templates	Ex. H-03
WWRO22 (Dec 2020) – paragraph #12.2	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect, version 1	Ex. H-04
WWRO22 (Dec 2020) – paragraph #12.3	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect, version 1	Ex. H-05
WWRO22 (Dec 2020) – paragraph #13	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect Version 2	Ex. H-06
WWRO22 (Dec 2020) – paragraph #14	Non-Compliance Letter	Ex. H-07
WWRO22 (Dec 2020) – paragraph #16	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect Version 3	Ex. H-08

WWRO22 (Dec 2020) – paragraph #17	Contract Actions in SCOR Webinar	Ex. H-09
WWRO22 (Dec 2020) – paragraph #19	RO22 Failure to Report ANE 08-02-19 to 03-03-20 Ad Hoc Report	Ex. H-10
WWRO22 (Dec 2020) – paragraph #20	Procedures in Response to RCC Contractor Citation for Failure to Report Abuse/Neglect Version 4	Ex. H-11
WWRO22 (Dec 2020) – paragraph #22.1	Compliance with Serious Incident Reporting Requirements as to RO22 Failure to Report ANE 6.1.19 to 8.31.19	Ex. H-12
WWRO22 (Dec 2020) – paragraph #22.2	RO22 Failure to Report ANE 09.01.19- 11.30.19	Ex. H-13
WWRO22 (Dec 2020) – paragraph #22.3	RO22 Failure to Report ANE 08-02-19 to 03-03-20 Ad Hoc Report and Quarter 2 Report dated 12-1-19 to 2-29-20	Ex. H-14
WWRO22 (Dec 2020) – paragraph #22.4	RO22 Failure to Report ANE 03.01.20 to 05.31.20	Ex. H-15
WWRO22 (Dec 2020) – paragraph #22.5	RO22 Failure to Report ANE 06.01 .20 to 08.31.20	Ex. H-16
WWRO22 (Dec 2020) – paragraph #22.6	RO22 Failure to Report ANE 09.01.20 to 09.30.20	Ex. H-17
WWRO22 (Dec 2020) – paragraph #22.7	RO22 Failure to Report ANE 10.01.20 to 10.31.20	Ex. H-18
WWRO22 (Dec 2020) – paragraph #22.8	RO 22 Failure to Report ANE 11.01.20 to 11.30.20	Ex. H-19
Exhibit I Declaration of Carol Self (May 2021) - Remedial Orders 26, 26, 27, 29, and 31		
CSRO25, 26, 27, 29, 31 (May 2021) paragraph 4	January 14, 2021 Email from DFPS Residential Contracts, <i>Updates to the 24-hour</i> <i>RCC Contracts</i>	Ex. I-01

CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 5	January 14, 2021 Email from DFPS Residential Contracts, ACTION REQUIRED 24-Hour RCC Requirements Section 1420	Ex. I-02
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 7.1	January 7, 2021, Email from DFPS CPS Communications, Webinar – Refresher on Sexual Victimization History and Notice of Investigations	Ex. I-03
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 7.2	March 4, 2021, Email from DFPS CPS Communications, Webinar – Refresher on Sexual Victimization History in IMPACT	Ex. I-04
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 9	Case Read - Sexual History and Placement Authorization Review FY21 Q1_PMand Q1- FY 21 Sexual History Report Final Draft	Ex. I-05
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 10.1	13237- CPS Redline	Ex. I-06
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 10.2	February 8, 2021, Email from Bugg to Monitors, <i>Policy Updates, Blue Prints, Meeting in a Box, and Field Communications</i>	Ex. I-07
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 11.1	February 12, 2021, Email from DFPS IMPACT, IMPACT Release Notes 2/11/2021	Ex. I-08
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 11.2	April 9, 2021 Email from DFPS IMPACT, IMPACT Release Notes 4/8/2021	Ex. I-09
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 12	March 31, 2021 Email from Eaton to Monitors, <i>UPDATE: Caregiver Notification</i> <i>Policies – Child/Youth Sexual History</i>	Ex. I-10
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 13.1	Caregiver Notification Training 2.15	Ex. I-11
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 13.2	Caregiver Notification Training FAD 2.18	Ex. I-12

CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 16.1	Attachment A Letter- Psych Hospitals	Ex. I-13	
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 16.2	FW: Hospital Letter- Attachment A	Ex. I-14	
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 19	April 2, 2021 Email from DFPS Residential Contracts to Residential Providers, Court Ordered Recognizing and Reporting Child Sexual Abuse: A Training for Caregivers Caregiver Update	Ex. I-15	
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 21	February 23, 2021 Email from Bugg to Monitors, Fw: Training Update	Ex. I-16	
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 22	March 10, 2021 Email from Bugg to Monitors, Red-Lined Policy, Meeting in a Box, Blue Prints, Training and Field Communications	Ex. I-17	
CSRO25, 26, 27, 29, 31 (May 2021) – paragraph 23	March 20, 2021 Email from Bugg to Monitors, RCCI Danger Indicator Training	Ex. I-18	
Exhibit J Declaration of Car	Exhibit J Declaration of Carol Self (Jan 2021) - Remedial Orders 26, 26, 27, 29, and 31		
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #6.1	2Ingage Region 02 Placement Change	Ex. J-01	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #6.2	OCOK-Placement Summary Form	Ex. J-02	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #6.3	Family Tapestry Child Placement Information Form	Ex. J-03	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #9	Cover Emails to Monitors Accompanying Recurring Reports Nov 2019 – Dec 2020	Ex. J-04	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #40	May 2020 Email to Monitors	Ex. J-05	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #49	July 2020 Email to Monitors	Ex. J-06	

CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #52	Emails to Monitors re Caregiver Definition	Ex. J-07
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #53	RO24-31 Sexual History Case Read Report Q4 FY 2020	Ex. J-08
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #54	October 2020 Email to Monitors	Ex. J-09
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #55.1	November 2020 Email to Monitors	Ex. J-10
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #55.2	November 2020 Email to Monitors re RO3 Child in Care Request	Ex. J-11
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #56	November 2020 Worker Communication re FCL Caregiver Notification	Ex. J-12
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #57	Cover Emails to Monitors Accompanying Recurring Reports Nov 2019 – Dec 2020	Ex. J-13
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #58	December 2020 Email to Monitors	Ex. J-14
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #59	December 2020 Notice to Residential Child Care Contract Providers	Ex. J-15
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #60.1	December 2020 CPS Handbook Updates	Ex. J-16
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #60.2	Child Sexual Aggression Resource Guide December 2020	Ex. J-17
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #60.3	Kinship Caregiver Agreement December 2020	Ex. J-18
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #60.4	Placement Summary Form December 2020	Ex. J-19

CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #60.5	December 2020 Email to Monitors	Ex. J-20
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #61	November 2020 Worker Communication re FCL Caregiver Notification	Ex. J-21
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #62	PMC Caregiver Notification 1-14-21 with pp_26	Ex. J-22
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #63	December 2020 Guidance to Residential Providers	Ex. J-23
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #66.1	January 2021 Meeting In A Box Agenda	Ex. J-24
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #66.2	Psychiatric Hospital Contact Protocol for Children	Ex. J-25
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #67	January 2021 Email to Staff re Webinar	Ex. J-26
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.1	24_Hour_RCC_Requirements January 2021	Ex. J-27
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.2	7911 – Notice of Sexual History to Temporary Caregivers	Ex. J-28
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.3	Certification of Receipt of CSA Information	Ex. J-29
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.4	Certification Statement	Ex. J-30
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.5	K-908-2279a	Ex. J-31
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.6	Child Specific Amendments	Ex. J-32

CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.7	Community Based Care Amendment	Ex. J-33	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.8	Emails to Out of State Non-Contracted Caregivers	Ex. J-34	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.9	FY21 24-Hour RCC Contract Update Changes on 1-14-21	Ex. J-35	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.10	January 2021 Email to Providers Section 1420	Ex. J-36	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.11	January 2021 Email to Residential Providers	Ex. J-37	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.12	January 2021 Notification to FAD Staff	Ex. J-38	
CSRO25, 26, 27, 29, 31 (Jan 2021) paragraph #68.13	Process for Out of State Non-Contracted Notifications	Ex. J-39	
Exhibit K - Declaration of I	Exhibit K - Declaration of Hector Ortiz (May 2021) Remedial Order 37		
HORO37 (May 2021) paragraph #9	CPS policy 4221.1	Ex. K-01	
HORO37 (May 2021) paragraph #11	Source Document: Q1-FY 21 PMC Hm Hx Rev Report.pdf	Ex. K-02	
HORO37 (May 2021) paragraph #14	Field Communication: Immediate Changes to Home History Review Documentation and attached Home History Reviews Communication	Ex. K-03	
HORO37 (May 2021) paragraph #16	Burstain Email entitled Agenda Item for Our Next Thursday meeting	Ex. K-04	

Exhibit L - Declaration of Stephen Black (May 2021)			
SBRO37 (May 2021) paragraph # 8	Home History Review Process and Screenshots	Ex. L-01	
SBRO37 (May 2021) paragraph #9	CPS Policy 4221.1	Ex. L-02	
SBRO37 (May 2021) paragraph #13.1	March 11, 2021 Email from Zarate to DFPS SWI, PN Dropdown Changes Coming 3/25	Ex. L-03	
SBRO37 (May 2021) paragraph #13.2	Maintenance Completed: IMPACT 2.0, IMPACT Legacy, SWI Maintenance for Thursday 4/8/2021 9:00 p.m. – 11:00 p.m. has completed	Ex. L-04	
Exhibit M - Declaration of	Exhibit M - Declaration of Hector Ortiz (Jan 2021) Remedial Order 37		
HORO37 (Jan 2021) paragraph #8	Home History Review Process and Screenshots	Ex. M-01	
HORO37 (Jan 2021) paragraph #9	CPS Policy 4221.1	Ex. M-02	
HORO37 (Jan 2021) paragraph #24	CPS Policy Handbook Section 4221.1, October 2, 2019 version	Ex. M-03	
HORO37 (Jan 2021) paragraph #29.1	CPS Policy 1411	Ex. M-04	
HORO37 (Jan 2021) paragraph #29.2	Email ACTION REQUIRED: Sub Stages Must Remain Open Until Adoption Consummation	Ex. M-05	
HORO37 (Jan 2021) paragraph #33.1	Email re RO 37	Ex. M-06	
HORO37 (Jan 2021) paragraph #33.2	Home History Review Process and Screen Shots	Ex. M-07	
HORO37 (Jan 2021) paragraph #34.1	Q1-FY 20 Hm Hx Rev Report	Ex. M-08	
HORO37 (Jan 2021) paragraph #34.2	RO 37 Q2 FY 2020 Home History Review Case Read Report	Ex. M-09	

Case 2:11-cv-00084

Page 30 of 34

Email (EFFECTIVE IMMEDIATELY!!!! Handling Intakes Upon Receipt from SWI)	Ex. M-26	
Procedures for RCCI Screeners Notifying CPS of Alleged Abuse or Neglect	Ex. M-27	
Revised CPS Policy 4221.1	Ex. M-28	
Email to Monitors (Class Training & RCCI and CPS Policy Updates	Ex. M-29	
CLASS Storyboards	Ex. M-30	
Important: Class Training	Ex. M-31	
Erica Bañuelos (May 2021) - Remedial Order l	B5	
Policy 4221.2 CPS Responsibility and Procedure after Receiving a Notification of Abuse or Neglect by either RCCI or CPI	Ex. N-01	
Eaton email to the Monitors' dated April 7, 2021	Ex. N-02	
March 2021 data (unfiled)	Ex. N-03	
Email MD V Abbott	Ex. N-04	
Email entitled Reminder: I&R CVS Caseworker Notification	Ex. N-05	
Eaton email to Monitors' dated April 1, 2021	Ex. N-06	
Exhibit O - Declaration of Erica Bañuelos (Jan 2021) - Remedial Order B5		
CPS Policy 1411 updated on October 30, 2020	Ex. O-01	
	Handling Intakes Upon Receipt from SWI)  Procedures for RCCI Screeners Notifying CPS of Alleged Abuse or Neglect  Revised CPS Policy 4221.1  Email to Monitors (Class Training & RCCI and CPS Policy Updates  CLASS Storyboards  Important: Class Training  Crica Bañuelos (May 2021) - Remedial Order Interpretate Policy 4221.2 CPS Responsibility and Procedure after Receiving a Notification of Abuse or Neglect by either RCCI or CPI  Eaton email to the Monitors' dated April 7, 2021  March 2021 data (unfiled)  Email entitled Reminder: I&R CVS Caseworker Notification  Eaton email to Monitors' dated April 1, 2021  Crica Bañuelos (Jan 2021) - Remedial Order B	

EBROB5 (Jan 2021) – paragraph # 4.2	Email (ACTION REQUIRED: Sub Stages Must Remain Open Until Adoption Consummation)	Ex. O-02
EBROB5 (Jan 2021) – paragraph #5.1	FCL IandR AN Notification Staffing	Ex. O-03
EBROB5 (Jan 2021) – paragraph #5.2	FCL IandR CVS Caseworker Notification	Ex. O-04
EBROB5 (Jan 2021) – paragraph #6	Procedures for RCCI Screeners Notifying CPS of Alleged Abuse or Neglect in Foster Homes	Ex. O-05
EBROB5 (Jan 2021) – paragraph #8	Policy 4221.2 CPS Responsibility and Procedure after Receiving a Notification of Abuse or Neglect by either RCCI or CPI	Ex. O-06
EBROB5 (Jan 2021) – paragraph #9.1	Policy Clarifications and IMPACT Updates Regarding Notifications of RCCI or CPI Investigations and IR Updated Communication Final	Ex. O-07
EBROB5 (Jan 2021) – paragraph #9.2	Policy Clarifications and IMPACT Updates Regarding Notifications of RCCI or CPI Investigations and IR Updated Communication Final	Ex. O-08
EBROB5 (Jan 2021) – paragraph #10.1	SSCC Notification RE Immediate Changes to Home History Review Reporting Notifications Staffings and Documentation	Ex. O-09
EBROB5 (Jan 2021) – paragraph #10.2	SSCC Notification RE policy Clarifications and IMPACT Updates Regarding Notifications of RCCI or CPI Investigations	Ex. O-10

Respectfully submitted,

KEN PAXTON Attorney General of Texas

BRENT WEBSTER First Assistant Attorney General

**GRANT DORFMAN** Deputy First Assistant Attorney General

NANETTE DINUNZIO Associate Deputy Attorney General for Civil Litigation

ELIZABETH J. BROWN FORE Chief, Administrative Law Division

<u>/s/ Elizabeth J. Brown Fore</u> ELIZABETH J. BROWN FORE State Bar No. 24001795 Southern District Bar No. 27819 Division Chief, Administrative Law Division

KARA HOLSINGER State Bar No. 24065444 Southern District Bar No. 952327 Deputy Chief, Administrative Law Division

CLAYTON R. WATKINS State Bar No. 24103982 pro-hac vice

Assistant Attorneys General OFFICE OF THE ATTORNEY GENERAL OF TEXAS P.O. Box 12548, Capitol Station Austin, Texas 78711-2548 Telephone: (512) 936-0804 Facsimile: (512) 320-0167 elizabeth.brownfore@oag.texas.gov kara.holsinger@oag.texas.gov clayton.watkins@oag.texas.gov

Attorneys for Jaime Masters, in her official capacity as Commissioner of Department of Family and Protective Services of the State of Texas

## **CERTIFICATE OF SERVICE**

I hereby certify that on May 5, 2021, a true and correct copy of the foregoing document has been served via email on all parties of record.

/s/ Elizabeth J. Brown Fore
ELIZABETH J. BROWN FORE